

Camp Robin Restoration Project

Cultural Resource Report

Prepared by:
Beth Bigelow
Archaeologist

for:
Bonners Ferry Ranger District
Idaho Panhandle National Forests

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Executive Summary

Heritage resource concerns under the National Historic Preservation Act and associated laws, rules, and regulations within the Camp Robin project area include the protection and preservation of a Traditional Cultural Property as identified by two tribal nations and 17 other heritage properties. All 18 of these heritage resources are within proximity to planned activities and will be protected from incursion and damage through the addition of a no-activity buffer around the perimeter of each site as defined within the project design criteria. All Tribal and Idaho SHPO consultation and public outreach will be completed prior to project implementation.

Introduction

This document details how the Idaho Panhandle National Forest, Bonners Ferry Ranger District, will meet the requirements of the National Historic Preservation Act, Section 106 identification, documentation, protection, and management of historic properties during the project activities of the Camp Robin Restoration Project. In particular, this report summarizes the existing condition of cultural resources within the Camp Robin project area, as well as the direct, indirect, and cumulative effects of the proposed actions to cultural resources under each alternative. To thoroughly evaluate effects, the proposed timber extraction, proposed reforestation, culvert replacement, temporary road construction, and road maintenance (brushing and blading) will be analyzed. Lastly, alternative consistency with the Forest Plan is summarized.

Relevant Laws, Regulations, and Policy

Regulatory Framework

Land and Resource Management Plan

The 2015 Idaho Panhandle National Forests Land and Resource Management Plan (LRMP) provides standards and guidelines for activities on IPNF public lands and cultural resource management (see Attachment A - 2015 Forest Plan Forest-wide Consistency).

Federal Law

National Historic Preservation Act (NHPA) of 1966 as amended, specifically Section 106, is the foremost legislation that governs the treatment of cultural resources during project planning and implementation. Implementing regulations that clarify and expand upon the NHPA include:

- 36 CFR 800 Protection of Historic Properties
- 36 CFR 63 Determination of Eligibility to the National Register of Historic Places
- 36 CFR 296 Protection of Archaeological Resources

National Environmental Policy Act (NEPA) is also a cultural resource management directive as it calls for agencies to analyze the effects of their actions on socio-cultural elements of the environment.

American Indian Religious Freedom Act (AIRFA) of 1978 requires that federal agencies consider the impacts of their projects on the free exercise of traditional Indian religions.

Also guiding Forest Service decision-making as it relates to cultural are the following laws:

- National Forest Management Act* (NFMA) of 1976
- Archaeological Resources Protection Act* (ARPA) of 1979
- Native American Graves Protection and Repatriation Act* (NAGPRA) of 1990
- American Indian Religious Freedom Act* (AIRFA) of 1978

Executive Orders

Executive Order 13007 (Indian Sacred Sites) requires that federal agencies consider the impacts of their decision-making as it relates to cultural.

Other Guidance or Recommendations

The Northern Region (R1) of the Forest Service, the ACHP, and Idaho SHPO, signed a programmatic agreement regarding the management of cultural resources on National Forest system lands in 2004. The agreement outlines specific procedures for the identification, evaluation, and protection of cultural resources during proposed activities in compliance with Section 106 of the National Historic Preservation Act.

FSM 2300 – Recreation, Wilderness, and Related Resource Management; Chapter 2360 – Cultural Program Management

The LRMP tiers to the previously mentioned laws and corresponding Forest Service manual direction as it sets forth resource management goals, objectives, and standards (see Attachment A).

Topics and Issues Addressed in This Analysis

Resource Indicators and Measures

Resource indicators and measures for historic properties are, by definition, a measure of potential for “adverse effect” as defined under Section 106 of the National Historic Preservation Act. An adverse effect is found when an undertaking may alter, directly or indirectly, any of the characteristics of a historic property that qualify the property for inclusion in the National Register in a manner that would diminish the property’s integrity of the property’s location, design, setting, materials, workmanship, feeling, or association. Adverse effects may include reasonably foreseeable effects caused by the undertaking that may occur later in time, be farther removed in distance, or be cumulative. [36 C.F.R. § 800.5(a)(1)]

A *direct effect* to a historic property would include demolition of a historic building, major disturbance of an archaeological site, or any other actions that occur to the property itself. *Indirect effects* may change the character of the property’s use or physical features within the property’s setting that contribute to its historic significance; are often audible, atmospheric, and visual effects; and may relate to viewshed issues. Adverse effects may include reasonably foreseeable effects caused by the undertaking that may occur later in time, be farther removed in distance, or be cumulative. [36 C.F.R. § 800.5(a)(1)] While the Section 106 regulations do not define “cumulative effects,” the CEQ regulation definition of “cumulative impact” is analogous.

Table 1. Resource indicators and measures for assessing effects

Resource Element	Resource Indicator	Measure (Quantify if possible)	Used to address: P/N, or key issue?	Source (LRMP S/G; law or policy, BMPs, etc.)?
Historic Properties (archaeological sites determined to be eligible or of undetermined eligibility nomination to the NRHP).	Alteration or loss of element(s) or indicators that create a NRHP eligibility scenario.	Loss of previously existing element(s) or indicators.	No	36CFR800 36CFR60 Forest Plan (2015) NHPA (1966) EO 13007- Indian Sacred Sites FSM 2360 (2008)

Methodology

The Camp Robin Restoration project planning area includes all National Forest system lands administered by the Bonners Ferry Ranger District that are within the projects’ designated boundaries. The cultural

resources effects analysis, including cumulative effects, will focus on cultural properties identified within the combined alternatives' maximum planned areas of impact within the project area.

Cultural management resource elements for analysis within the project area are defined first by those properties previously located, documented, and currently managed within the project area. These properties were identified through a review and analysis of known literature and previous research, geographic information system (GIS) cultural data and archival records, and consultation with those tribes who claim aboriginal territory within the project area to define possible sites, Traditional Cultural Properties, and areas of continued cultural concern. Second, these resource elements for analysis are further defined by in-field inventory of those areas not previously inventoried for the occurrence of cultural properties.

Qualified Heritage professionals completed a cultural resource inventory survey meeting current methodological standards for the Camp Robin Restoration project planning area. All potential project activities were analyzed for potential effects to historic properties and cultural landscapes.

Pertinent facts within this report include: reporting of 38 archaeological sites, of which 22 are either eligible for nomination to the National Register of Historic Places (NRHP) or of undetermined eligibility and will be managed, and 16 sites are not eligible for nomination to the NRHP and have been released from further management. Of those sites eligible 18 are within proximity to planned activities and will require some adherence to stated project design criteria.

All documentation and data related to this fieldwork are incorporated into a Heritage Survey Inventory report (HRI), submitted to the Idaho SHPO for review. Concurrence documentation from the Idaho SHPO will be located in the administrative file.

Information Sources

Source information for the analysis of the project activities on historic properties included: all relevant previous archaeological and cultural resource inventory survey reports; oral histories; academic post-contact and pre-contact research conducted within the area; appropriate historic maps (for location purposes), including Grant Land Office, Metzger, Forest Service; and all other appropriate documentation relevant to the pre-contact and post-contact utilization of the project area. Tribal cultural resource staff provided information on both known sites, Traditional Cultural Properties, and elements to identify locations of higher probability for the location of important cultural resources.

Incomplete and Unavailable Information

All possible data sources have been identified and integrated into the research and analysis of potential effects.

Spatial and Temporal Context for Effects Analysis

The spatial analysis for potential effects to under the NHPA will include all areas of planned undertaking within the proposed project area as defined in 36 CFR 800.11. This will include specifically the individual proposed cut units, burn units, road maintenance, temporary road construction, aquatic organism passage replacement, and potential recreation and heritage enhancement opportunities. The temporal scope of the analysis will include both effects to the current status of historic properties and an analysis of how the activities planned within the current proposed project will add to the cumulative effects to those historic properties.

Effects to historic properties, especially adverse effects, are permanent and almost always irreversible.

Direct/Indirect Effects Boundaries

The spatial boundaries for analyzing the direct effects to historic properties include all areas of direct impact by project activities, because direct effects are those that have the ability to alter either the historic property constituents or the environment that provides for an eligibility determination (setting, feeling, etc.).

The spatial boundaries for analyzing the indirect effects to historic properties can include the historic property soundshed and viewshed because visual and sound alterations to the setting, feeling, association, etc., can have an adverse effect to the historic property eligibility to the NRHP. Indirect effect special boundaries can also include the topography surrounding but outside of the historic property boundary, as changes in soil structure can lead to displacement and encroachment into historic property boundaries.

The temporal boundaries for analyzing the direct effects are throughout the life of the project because project activities have the potential for direct effects to historic properties.

The temporal boundaries for analyzing the indirect effects are throughout the life of the project and within 10 years post-action, because changes to the landforms, sounds, and visuals can change over time at different rates.

Cumulative Effects Boundaries

The spatial boundaries for analyzing the cumulative effects to historic properties include the project area, because effects to historic properties past, present, and foreseeable future are not limited to the historic property itself.

The temporal boundaries for analyzing the cumulative effects being at the execution of project activities and can extend beyond the completion of the project by several decades because direct and indirect actions can add to the cumulative adverse effects to historic properties.

Affected Environment

Existing Condition

As defined in 36 CFR 60(4) each historic property must contain at least one of the following criteria to be considered eligible to the NRHP:

- a. That are associated with events that have made a significant contribution to the broad patterns of our history, or
- b. That are associated with the lives of significant persons or in the past, or
- c. That embody the distinctive characteristics of a type, period, or method of construction, or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction, or
- d. That have yielded or may be likely to yield information important to history or prehistory.

Alteration with some appropriate mitigation under consultation with both the SHPO and ACHP is defined as a “no adverse effect”, but is still considered legally an adverse or negative impact to the overall integrity and value of the historic property. Loss of those elements or indicators specific to each individual historic property is defined as an ‘adverse effect’ to that property.

Cultural resource identification efforts in the vicinity of the Camp Robin Restoration Project planning area have focused on two primary types of cultural resources: pre-contact era (Indigenous) archaeological

sites and proto-historic and/or historic era (non-indigenous) archaeological sites. Places that may support resources of contemporary tribal interest, (i.e. culturally significant plant locations), were also considered.

There have been twelve (12) cultural resource inventories previously conducted within and immediately adjacent to the boundary of this project. These surveys have resulted in the discovery of 63 cultural resource sites within the project planning area boundary. All of the sites within the project area three (3) were pre-contact era (one of which is considered a Traditional Cultural Property) and 60 were historic era sites. Of those sites within the project area, 26 were determined not eligible and 28 were determined eligible, leaving the remaining 9 under management and protection from adverse effects. Many of these eligible and potentially eligible sites occupy strategic places on the landscape and provide Forest visitors with a visual connection to key periods in the history of northern Idaho.

Table 2. Resource indicators and measures for the existing condition

Resource Element	Resource Indicator (Quantify if possible)	Measure (Quantify if possible)	Existing Condition
All historic properties and those archaeological sites of undetermined eligibility status.	The element(s) that qualify the site for nomination to the NRHP.	“no adverse effect” as defined under 36CFR800.5(3)(b): If an activity can foreseeably alter the element(s) that qualify the historic property for inclusion in or eligibility for the NRHP, but can be mitigated in consultation with SHPO and ACHP.	The element(s) exist for the historic property's determination of eligibility.
All historic properties and those archaeological sites of undetermined eligibility status.	The element(s) that qualify the site for nomination to the NRHP.	“adverse effect” as defined in 36CFR800.5(1): If an activity can foreseeably remove the element(s) that qualify the historic property for inclusion in or eligibility for the NRHP	The element(s) exist for the historic property's determination of eligibility.

Environmental Consequences

Alternative 1 – No Action

By strict definition, direct and indirect effects (40 CFR 1508.8), and cumulative effects (40 CFR 1508.7) result from the proposed action, however under the No Action Alternative for this project the potential direct, indirect, and cumulative effects to cultural resources could be profound if no action is taken.

Without some level of vegetation and multi-utilization restoration work in areas of complex, wooden, historic properties, as well as planned recreation management of those properties, historic era cultural resources are at high risk of adverse effect from environmental forces, including: wildfire and environmental degradation as well as continued vandalism and inappropriate use by unconstrained recreation.

Alternative 2 – Proposed Action

The proposed action includes:

Potential ‘undertaking’ activities (as per 36 CFR 800.16(y)) within the 42,250 acre project area include:

- 89 acres of precommercial thinning
- 5,805 acres of tree removal utilizing the following strategies:
 - 1,310 acres of helicopter,
 - 3,020 acres tractor (ground-based),
 - 1,048 acres log forwarder
 - 347 acres skyline, and
 - 80 acres combined tractor and skyline
- 5,805 acres of planned burn strategies associated with harvest (within harvest units):
 - 1,368 acres underburn
 - 1,719 acres grapple pile
 - 1843 acres whole tree yard
 - 870 acres whole tree yard and underburn
 - 5 acres masticate
- 386 acres of planned burn outside of harvest units
 - 386 acres burn only
- 86.60 miles of roads work:
 - 54 miles road maintenance
 - 9.8 miles road reconstruction
 - 2.1 miles of road decommissioning
 - 13 miles temporary road construction and post-harvest obliteration
 - 1.6 miles Unclassified road/trails converted to open OHV/ATV use
 - 1.5 miles system roads access blocked and added to OHV trails system
- Removal of one (1) Fish Barrier
- Removal of culverts on roads closed to use
- One parking area expanded and improved
- Treat weed populations along trailheads and roads through application of USFS approved herbicides and weed management practices.

Project Design Features and Mitigation Measures

All specific project design criteria meet the objectives as stated in the Forest Plan (2015), National Historic Preservation Act (1966), and the Programmatic Agreement between the Idaho Panhandle National Forests and the Idaho State Historic Preservation Officer (2001) for both Alternative 2. All site specific measures for known cultural resource sites would be incorporated into special provision C6.24. Project design criteria will include:

Table 3: Specific heritage site design features:

Site	Location	Buffer		Site	Location	Buffer
10BY0219	Unit 32	50’ from site boundary		10BY0229	Unit 37	50’ from site boundary
RH-02	Unit 30	50’ from site boundary		10BY0230	Unit 37	50’ from site boundary
RH-01	Unit PCT-03	50’ from site boundary		10BY0275	Unit 50	50’ from site boundary

10BY0320	Unit 2	50' from site boundary		10BY0440	Northern terminus of FSR 1004	50' from site boundary
10BY0035	Unit 20	50' from site boundary		10BY0279	Junction of FS Roads 397 & 397J	50' from site boundary
10BY0368	Units 54, 40	50' from site boundary		10BY0280	Junction of FS Roads 397 & 397J	50' from site boundary
10BY0369	Unit 40	50' from site boundary		10BY0233	Units 49, 42, 34, 35, 36, 37, 39	200' from center line
CD-01	Unit 42	50' from site boundary		10BY0304	Unit 10 and the PCT units within Unit 10	200' from center line
CD-02	Units 42, 40	50' from site boundary		10BY0283	Junction of FS Roads 397 & 397Y	50' from site boundary

Heritage sites within or adjacent to treatment areas or other undertakings:

- All slash piling, either by hand or ground-based machines, landings and other staging areas, skid trails, and other areas utilized for project operations will occur outside of cultural resource boundaries.
- All cultural resources (including the unanticipated discovery of any historic or pre-contact era cultural sites) including buildings, trails, mining or logging camps and chutes, and all other heritage properties would be protected by avoiding, buffering, or mitigating impacts to the sites. This includes caves, sinkholes, vertical shafts, and related features protected by the Federal Cave Resources Act of 1988.
- All eligible and potentially eligible (unevaluated) historic properties with structural remains or other combustible feature types will be avoided/protected during all burning activities.

To be assessed by an IPNF archaeologist prior to implementation:

- Slash burning within site boundaries
- Landings, skid trails placed outside of harvest units
- Proposed new single track trail identified in the EA under recreation

Unanticipated discovery -

- If during project activities cultural material or human remains are encountered, all work will cease immediately and the zone or forest archaeologist contacted and the approved Region 1 "Unanticipated Discovery Plan and Discovery of Human Remains Protocols" (Plan) will be implemented. This Plan will be incorporated into special provision C6.24# to protect these resources. A mitigation plan, if needed, will be developed in consultation with the Idaho State Historic Preservation Officer (SHPO) and Federally Recognized Tribes of Interest if appropriate.

Estimated Effectiveness: High. The measures noted above have been used on other projects on the Idaho Panhandle and on other national forests nationwide with high levels of success.

Required Monitoring

No monitoring is required.

Direct and Indirect Effects - Alternative 2

A project is considered to have an adverse effect on cultural properties when it results in the alteration of characteristics that qualify the property for the National Register of Historic Places (NRHP). All historic properties that have been identified within the Camp Robin Restoration planning area are being managed as eligible for the NRHP on the basis of their ability to yield scientific information that is important to studies of prehistory and history. Therefore, proposed activities that modify the patterning of surface or buried archaeological deposits are considered to result in a direct adverse effect.

The proposed activities of Alternatives 2 are expected to have no direct or indirect effects on any known heritage sites within the project planning area both through the agreed avoidance of all known and located sites and as long as the Project Design Criteria in Table 4 are followed.

Resource Indicator and Measure 1

All sites regardless of eligibility status are protected from potential “no adverse effect” scenarios through avoidance, project design, and planning to avoidance possibility of intrusion into the site area by project activities.

Resource Indicator and Measure 2

All sites regardless of eligibility status are protected from potential “adverse effect” scenarios through avoidance, project design, and planning to avoidance possibility of intrusion into the site area by project activities.

Table 4. Resource indicators and measures for alternative 2 direct/indirect effects

Resource Element	Resource Indicator (Quantify if possible)	Measure (Quantify if possible)	Alternative 2 Direct/Indirect Effects
Each archaeological site that has yet to receive an eligibility determination or that has been determined to be eligible for the National Register of Historic Places.	Any element of an individual archaeological site that could qualify that individual archaeological site for nomination to the NRHP.	“no adverse effect” as defined under 36CFR800.5(3)(b): If an activity can foreseeably alter the element(s) that qualify the historic property for inclusion in or eligibility for the NRHP, but can be mitigated in consultation with SHPO and ACHP.	No sites are in danger of a “no adverse effect” scenario through deliberate project design.
Each archaeological site that has yet to receive an eligibility determination or that has been determined to be eligible for the National Register of Historic Places.	Any element of an individual archaeological site that could qualify that individual archaeological site for nomination to the NRHP.	“adverse effect” as defined in 36CFR800.5(1): If an activity can foreseeably remove the element(s) that qualify the historic property for inclusion in or eligibility for the NRHP.	No sites are in danger of an “adverse effect” scenario through deliberate project design.

Cumulative Effects – Alternative 2

Past, Present, and Reasonably Foreseeable Activities Relevant to Cumulative Effects Analysis

Past, ongoing, and foreseeable actions that have affected, and may continue to affect, heritage resources in the project planning area include timber harvest, prescribed fire, wildfires and associated suppression and rehabilitation activities, road and trail construction and/or maintenance, and dispersed recreational use.

One heritage-rich area within the APE has experienced heavy utilization by unauthorized off-road motorized recreationalists as well as artifact and feature removal during the 20th century, and activity that

likely continues although at a reduced rate. Past road construction has caused the most direct effects to those sites where a historic road or railroad bed/spur existed. Timber harvests have occurred relatively recently and to a limited extent and as a result, direct and indirect effects to heritage sites have been minimal.

Potential impacts that heritage sites might incur from such ongoing and foreseeable actions such as noxious weed treatment, prescribed burning, large vegetation treatment and extraction, recreation improvements, and any other potential undertakings common in lands management would be assessed and, if necessary, the potential impact would be avoided, minimized, or mitigated through the Section 106 process of the NHPA in consultation with the Idaho SHPO.

Resource Indicator and Measure 1

Through deliberate project planning and design all sites are protected from potential “no adverse effect” scenarios during the life of the project. Cumulative effects do not apply to the “no adverse effect” criteria.

Resource Indicator and Measure 2

Although all sites are protected from potential “adverse effect” scenarios through project design and planning to avoid the possibility of intrusion into the site area by project activities, any action has the potential a change in the overall landscape. Over time these changes can incrementally impact and diminish the integrity of the property’s location, design, setting, materials, workmanship, feeling, or association.

Table 5. Resource indicators and measures for alternative 2 and alternative 3 cumulative effects

Resource Element	Resource Indicator (Quantify if possible)	Measure (Quantify if possible)	Alternative 2 Cumulative Effects
Each archaeological site that has yet to receive an eligibility determination or that has been determined to be eligible for the National Register of Historic Places.	Any element that could qualify the site for nomination to the NRHP.	“no adverse effect” as defined under 36CFR800.5(3)(b): If an activity can foreseeably alter the element(s) that qualify the historic property for inclusion in or eligibility for the NRHP, but can be mitigated in consultation with SHPO and ACHP.	Cumulative Effects do not apply to the “no adverse effect” criteria
Each archaeological site that has yet to receive an eligibility determination or that has been determined to be eligible for the National Register of Historic Places.	Any element that could qualify the site for nomination to the NRHP.	“adverse effect” as defined in 36CFR800.5(1): If an activity can foreseeably remove the element(s) that qualify the historic property for inclusion in or eligibility for the NRHP.	Cumulative Effects can incrementally diminish the integrity of those aspects of the site that could qualify it for nomination to the NRHP, but they do not rise to the level of “adverse effect”

Summary

Degree to Which the Purpose and Need for Action is Met & Summary of Environmental Effects

Table 6. Summary comparison of how the alternatives address the purpose and need & environmental effects

Resource Element	Indicator/Measure	Alternative 1	Alternative 2
Each archaeological site that has yet to receive an eligibility determination or that has been determined to be eligible for the National Register of Historic Places.	The element(s) that qualify the site for nomination to the NRHP. "no adverse effect" as defined under 36CFR800.5(3)(b): If an activity can foreseeably alter the element(s) that qualify the historic property for inclusion in or eligibility for the NRHP, but can be mitigated in consultation with SHPO and ACHP.	There are no planned activities under Alternative 1, therefore no "no adverse effects" scenarios would exist.	No sites are in danger of a "no adverse effect" scenario through deliberate project design. Cumulative Effects do not apply to the "no adverse effect" criteria
Each archaeological site that has yet to receive an eligibility determination or that has been determined to be eligible for the National Register of Historic Places.	The element(s) that qualify the site for nomination to the NRHP. "adverse effect" as defined in 36CFR800.5(1): If an activity can foreseeably remove the element(s) that qualify the historic property for inclusion in or eligibility for the NRHP.	Alternative 1 will allow the continued "adverse effects" to eligible sites through lack of management of the ongoing increase in unauthorized motorized recreation within and around known heritage properties. Further, without active management, all historic properties will degrade over time from common environmental factors such as weather and biotic action.	No sites are in danger of an "adverse effect" scenario through deliberate project design. Current and ongoing damage to eligible sites from unauthorized motorized recreation will be remediated. Cumulative Effects can incrementally diminish the integrity of those aspects of the site that qualify it for nomination to the NRHP, but they do not rise to the level of "adverse effect".

Compliance with the Forest Plan and Other Relevant Laws, Regulations, Policies and Plans

With the implementation of the outlined Project Design Criteria, alternative 2 would meet the Forest Plan and all appropriate Cultural Resource laws, regulations, policies, and management direction.

Intensity Factors for Significance (FONSI) (40 CFR 1508.27(b))

Intensity. This refers to the severity of impact. Responsible officials must bear in mind that more than one agency may make decisions about partial aspects of a major action. The following should be considered in evaluating intensity:

The proposed action will not have an adverse effect on any property listed, eligible for listing, or of undetermined eligibility for listing on the National Register of Historic Places. There will be no loss or destruction of significant scientific, cultural, or historical resources.

Other Agencies and Individuals Consulted

As part of Section 106 of the NHPA, the following agencies and Tribal cultural staff and official government entities were consulted: Idaho State Historic Preservation Officer), Kootenai Tribe of Idaho, Confederated Tribes of the Colville Reservation, and the Confederated Salish and Kootenai Indians of the Flathead Indian Reservation (see Attachment C).

References Cited

Bigelow, B., 2018, *R2017010472492 - Heritage Site Inventory of the Camp Robin Restoration Project: Bonners Ferry Ranger District, Idaho Panhandle National Forests*; Administrative File, Idaho Panhandle National Forests, Supervisor's Office, Coeur D'Alene, Idaho [FOIA Exempt Documentation as per 36 CFR 800.11(c)]

Government Document, 2001, *Programmatic Memorandum of Agreement Between the USDA Forest Service, Northern Region, the Advisory Council on Historic Preservation, and the Idaho State Historic Preservation Officer Regarding Cultural Resources Management on Specified Northern Region National Forests in the State of Idaho.*

Attachment A

2015 Forest Plan Forest-wide Consistency

Goals:

CULTURAL RESOURCES		
GOAL-CR-01	37	Provide education about the importance of protecting cultural resources and the consequences for unlawful damage to or taking of cultural resources to reduce looting, vandalism, and incidental damage.
		<i>Response:</i> The planned interpretive signing at the recreation use area at historic Camp 9 contains an anti-vandalism, looting, and damage component.

Desired Conditions:

CULTURAL RESOURCES		
FW-DC-CR-01	37	Cultural resources are inventoried, evaluated for inclusion on the National Register of Historic Places, and managed according to their allocation category, including preservation, enhancement-public use, or scientific investigation. National Register ineligible cultural resources may be released from active management. Until evaluated, cultural resources are treated as National Register eligible. Historically and archaeologically important cultural resources and traditional cultural properties may be nominated to the National Register.
		<i>Response:</i> Site eligibility is defined in R2017010472492 - <i>Heritage Site Inventory of the Camp Robin Restoration Project: Bonners Ferry Ranger District, Idaho Panhandle National Forests</i> , Beth Bigelow,. Appropriate eligible properties are analyzed for utilization in enhancement and public use capacities. Through these planned actions, this desired condition has been fully met.
FW-DC-CR-02	38	Cultural resources are safeguarded from vandalism, looting, and environmental damage through monitoring, condition assessment, protection, and law enforcement measures. Interpretation and adaptive use of cultural resources provide public benefits and enhance understanding and appreciation of IPNF prehistory and history. Cultural resource studies provide relevant knowledge and perspectives to IPNF land management. Artifacts and records are stored in appropriate curation facilities and are available for academic research, interpretation, and public education.
		<i>Response:</i> Appropriate cultural resource protection language will be included within all appropriate project contract documents. All work accomplished and reported in R2017010472492 - <i>Heritage Site Inventory of the Camp Robin Restoration Project: Bonners Ferry Ranger District, Idaho Panhandle National Forests</i> , Beth Bigelow, 2018 will include all appropriate research information which will be available to be utilized in the future to meet planning goals for interpretation and adaptive use. Through these planned actions, this desired condition has been fully met.

Objectives:

CULTURAL RESOURCES		
FW-OBJ-CR-01	38	Annually complete an inventory of 50 to 100 acres containing, or predicted to contain, highly valuable, threatened, or vulnerable cultural resources (non-project acres).
		<i>Response:</i> Not relevant – not a project specific issue.
FW-OBJ-CR-02	38	Over the life of the Plan, evaluate and consider for nomination 5 to 10 significant cultural resources to the National Register of Historic Places.
		<i>Response:</i> Not relevant – not a project specific issue.
FW-OBJ-CR-03	38	Over the life of the Plan, develop five historic contexts, overviews, thematic studies, or cultural resources property preservation plans to help guide management and use of National Register eligible or listed properties, districts, traditional cultural properties, and cultural landscapes.
		<i>Response:</i> Not relevant – not a project specific issue.
FW-OBJ-CR-04	38	Annually complete one public outreach or interpretive project that enhances public understanding and awareness of cultural resources and/or history of the Plan area.
		<i>Response:</i> Not relevant – not a project specific issue.

Guidelines:

CULTURAL RESOURCES		
FW-GDL-CR-01	38	Cultural resource protection provisions should be included in applicable contracts, agreements, and special use permits for National Register-listed or eligible properties.
		<i>Response:</i> All contracts of work in relation to this project will include language for the protection of National Register-listed or eligible properties, either known or located through inadvertent discovery.
FW-GDL-CR-02	38	Historic human remains should be left undisturbed unless there is an urgent reason (e.g., human health and safety, natural event, etc.) for their disturbance.
		<i>Response:</i> All contracts of work in relation to this project will include language protection and preservation protocols for any inadvertent discovery of human remain.

Attachment B

Tribal Consultation (see administrative file for on-going consultation documentation)

Name of Tribe	Date of contact	Type of contact	Comments/Notes
Kootenai of Idaho	9/14/2017	Meeting: Ron Abraham	Reviewed the planned project activities, survey results, known sites, TCP, site buffering, and other issues in relation to cultural and heritage resources
	12/19/2017	Letter	Scoping letter provided from Forest Service
Confederated Tribes of the Colville Reservation	10/12/2015	Telephone	Defer to the Kootenai Tribe of Idaho on heritage/ cultural resource issues.
	12/19/2017	Letter	Scoping letter provided from Forest Service.
Confederated Salish and Kootenai Indians of the Flathead Indian Reservation	5/23/2017	Meeting: THPO, Heritage Preservation	Review of project with THPO, discussed planned activities, update on project timeline. Defer Heritage issues to the Kootenai of Idaho in this area, but wish to be kept apprised on any plans, results, or questions of eligibility of pre-contact era properties if found.
	12/19/2017	Letter	Scoping letter provided from Forest Service.

Tribal Government Contacts

Confederated Tribes of the Colville Reservation
 21st Colville Street
 Nespelem, WA 99155
www.colvilletribes.com

Kootenai Tribe of Idaho
 P.O. Box 1269
 Bonners Ferry, ID 83805
www.kootenai.org

Confederated Salish and Kootenai Tribes of the Flathead Indian Reservation
 P.O. Box 278
 Pablo, MT 59855
www.cskt.org

Attachment C

Public Involvement

Groups/Individuals	Date	Topics
Kootenai Valley Resource Initiative Board includes members from: <ul style="list-style-type: none"> • City of Bonners Ferry Mayor • Boundary County Commissioners • FS, Bonners Ferry Ranger District • Kootenai Tribe of Idaho • Boundary County Soil Conservation District • Idaho Department of Fish & Game • Communities: <ul style="list-style-type: none"> • Social/Cultural/Historical • Conservationist/Environmental • Corporate Agriculture • Business/Industry • Industrial/Forest Common Attendees, members from: <ul style="list-style-type: none"> • Idaho Department of Lands • Senator Jim Risch's office • Senator Mike Crapo's office • Congressman Raul Labrador's office • US Fish & Wildlife Service • NRCS for Boundary & Bonner Counties • Idaho Forest Products Commission • Idaho Forest Group • Kootenai National Wildlife Refuge • Yaak Valley Forest Council & Kootenai Forest Stakeholders Coalition 	4/17/2017	Update – general information
	5/12/2017	Project Update: What work will need to be done in the field for this project – identification of need and restrictions
	6/26/2017	Field trip to the project area
	11/20/2017	Project update: change from CX to one NEPA
	12/12/2017	Project update: timelines for upcoming NEPA and NHPA benchmarks
	1/22/2018	Project update: Scoping period closed, comments being reviewed, report out re: 1/4/18 public meeting
	2/1/2018	Project update: discussion of comment letter sent out 12/18, complete projects (Camp Dawson and Robin Hood) planned action review. Discussion of Camp 9 heritage site and Wild Horse Trail TCP. Discussed timber extraction methodology by location. Review of public comments supplied to scoping notice – including issues of: motorized trails,
	2/13/2018	Project update: review of ATV Trails System and road storage proposals within the Camp 9 heritage site, and BORZ
	2/26/2018	Project update: review of trails work around Camp 9 Heritage site, decision to merge Camp Dawson and Robin Hood projects into the new “Camp Robin” project
	3/19/2018	Project update: review of timelines and activities
Public Scoping	12/19/2017	Scoping letter sent to publics
Public Meeting	1/4/2018	6 publics, boundary County Extension Office

Attachment D

Unanticipated Discovery Plan and Discovery of Human Remains Protocols

If unanticipated cultural resources or human remains are identified during project activities the following protocols as established in the *R1 Heritage Protection Plan, USDA FS, 2011* as defined below. These protocols are based on federal law, regulation, and FSM policy and direction.

Unanticipated Discovery of Cultural Resources (see FSM 2364.13)

1. Forest Service line officer (Forest Supervisor, District Ranger) or delegated staff will:
 - A. Cease all project activity within (at minimum) 100ft of the unanticipated discovery until after the affected cultural resource(s) is evaluated and adverse effects to the cultural resource have been avoided, minimized, or mitigated.
 - B. Notify the Contracting Officer of work-stoppage if this discovery was caused by a contractor or cooperator. Ensure that the appropriate contracting procedures are being followed.
 - C. Protect the discovery from further damage, theft, or removal. Leave all artifacts and cultural materials in place. Involve law enforcement as necessary.
 - D. Follow the protocols below if the discovery involves human remains.
 - E. Follow the requirements of NAGPRA if associated or unassociated funerary objects or objects of cultural patrimony are discovered.
 - F. Involve FS Law Enforcement if the unanticipated discovery also involves deliberate removal or destruction of cultural resources.
 - G. Allow resumption of work only following resolution of the discovery incident. In most cases, this decision will be the District Ranger, but when human remains are involved the Forest Supervisor will make this decision.
2. Forest Heritage Program Leader, or delegated heritage program staff, will:
 - A. Document the unanticipated discovery using appropriate site recordation procedures and forms. This should include, but is not limited to, documenting exposed artifacts and features; mapping the extent of artifacts, features, and cultural horizons; and documenting natural and cultural stratigraphy in open trenches or pits.
 - B. Notify the SHPO, tribes, and other consulting parties, including any cultural resource consultants assigned to the project as appropriate.
 - C. Evaluate the cultural resources for National Register of Historic Places (NR) eligibility. Subsurface testing will be limited to a level sufficient to provide a recommendation of NR eligibility. The benefitting function or heritage program may fund the evaluation work contingent on the cause and nature of the discovery.
 - D. Funding to support evaluation may be provided by program activity (i.e., road maintenance) which caused the unanticipated discovery or by the Heritage Program.
 - 1) If the affected cultural resource is eligible for the NR, the heritage program leader will consult with the SHPO, tribes and consulting parties about measures to avoid, minimize, or mitigate further effects to the NR eligible cultural resource. Mitigation measures will be contingent on the type and extent of the disturbed

- resource, the extent of the adverse effect, and whether or not it is possible to avoid any further effects.
- 2) If the affected cultural resource is determined to be NR-ineligible, with SHPO concurrence, work may resume with appropriate monitoring for further cultural resource disturbances.
 - 3) If NR evaluation is not possible due to circumstances beyond control, the affected cultural resource will be treated as NR eligible in accordance with FSM 2363.22.
- E. Develop an action plan, mitigation plan, or emergency treatment plan for the affected cultural resources if the cultural resource is NR eligible OR if it is being treated as eligible absent formal evaluation per FSM 2362.22. Fund the action plan and necessary emergency treatment or mitigation work via benefiting function or heritage program contingent on the cause and nature of the discovery.
 - F. Document the unanticipated discovery in annual reports to the SHPO under programmatic agreements, and include an Event record in Infra, as appropriate.

Discovery of Human Remains (FSM 2361.3 and 2364.1)

Heritage professionals are often the first point of contact when human remains are discovered on National Forest System land. Advise the appropriate line officer to follow State burial laws or and these protocols.

1. Forest Service line officer (Forest Supervisor, District Ranger) or delegated staff will:
 - A. Ensure that ALL discovered human remains are treated with cultural sensitivity, dignity, and respect. Viewing and photographing exposed human remains by agency employees may compromise LE&I and forensic efforts.
 - B. Ensure that the beliefs and customs of American Indians, including agency employees, tribal consultants and public members, are respected. Exposure to human remains, directly or indirectly (i.e., a box containing skeletal material), may degrade and compromise spiritual beliefs and practices.
 - C. Ensure that the discovery area is secure; leave human remains in place; cease project activity where appropriate until a plan of action is developed and; involve LE&I immediately, and Heritage Professionals as appropriate.
 - D. Allow resumption of work only when the disposition of the human remains is determined and a written binding agreement is executed between the necessary parties in accordance with 43 CFR Part 10.4(e).
2. Forest Heritage Program Leader or delegated heritage program staff will:
 - A. Promptly notify SHPO, the appropriate Indian tribe(s), and the County Coroner/Medical Examiner, who will officially determine the nature of the remains (forensic or archaeological).
 - 1) If the remains are not forensic and non-Native American, leave the remains in place and assist in the development of a plan for avoidance (in place preservation) or removal. Consult with SHPO and other interested parties as appropriate.
 - 2) If the remains are not forensic and Native American, ensure that NAGPRA regulations at Section 10.4 of Title 43, Code of Federal Regulations, Part 10, are followed. Notify the appropriate Indian tribe(s) by telephone followed by written

confirmation as soon as practicable. Develop an Action Plan for disposition of Human Remains.

- 3) If the remains are forensic evidence, FS LE&I and/or the County Coroner/Medical Examiner take control of the situation.
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- B. Coordinate and communicate with the Line Officer, forest staff, LE&I, tribes, SHPO, and consulting contractors regarding progress and status of human remains discovery incident, as necessary and appropriate. Otherwise, treat this information as confidential.
 - C. Document the human remains incidents in annual reports to the SHPO under programmatic agreements, and include an Event record in Infra, as appropriate. Specifics of the discovery incident may be inappropriate but a general summary is important since these incidents are important to track.